

# **EXHIBIT**

**2**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE  
OF MEDICINE, a foreign corporation,

Plaintiff,

V

STEVEN L. WOODWARD,

Defendant.

United States District Court Judge  
Patrick J. Duggan, presiding  
Michael Hluchaniuk, referral  
Case No.: 2:10-cv-10978

Eric A. Buikema (P58379)  
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**PLAINTIFF'S REQUESTS FOR PRODUCTION PURSUANT TO FRCP 34**

Plaintiff American University of Antigua College of Medicine, through counsel, pursuant to Fed. R. Civ. P. 34 requests production of documents, electronically stored information and tangible things as identified below. Pursuant to Fed. R. Civ. P. 34(b)(2), you have 30 days from being served to respond. You must produce this information as kept in the ordinary course of business or organize and label to correspond to the categories in the request. Fed. R. Civ. P. 34(b)(2)(E). Fed. R. Civ. P. 26(e) imposes a duty upon you to timely supplement your responses.

**Definitions**

1. The words *documents and things* refer to all tangible material of any nature, including but not limited to, all written material such as graphs, charts, maps, drawings, correspondence, memoranda, records, notes, writings, manuals, books, photographs, recordings, images and all information stored electronically on a computer or archived software capable of reduction to a written document as well as all objects such as parts, pieces, samples, and related tangible things.
2. The words *possession, custody, or control* apply to all documents and things belonging to you that are in your possession, all documents and things belonging to others over which you have custody, and all documents and things in the custody of others over which you have the right of control.

**Documents and Things Requested**

- A. Please produce "Plaintiff's data auamed.org and auamed.net" as identified in your Rule 26 disclosures and which you intend to rely upon at trial.
- B. Please produce "Defendant's data from yahoo.com" as identified in your Rule 26 disclosures.
- C. Please produce all of "Defendant's data from YouTube.com" as identified in your Rule 26 disclosures.
- D. Please produce any and all videos you've produced which discuss plaintiff AUA.
- E. Please produce all documentation from the Circuit Court Cases identified on your Rule 26 amendments which you will rely upon at trial.
- F. Please produce "Audio files from Committee Meeting" which you identified in your Rule 26 disclosures.

- G. Please produce "Audio file Biochemistry Test Review" as identified in your Rule 26 disclosures.
- H. Please produce "Email from journalist, The Daily Herald" as identified in your Rule 26 disclosures.
- I. Please produce "Plaintiff's data from ValueMD.com" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- J. Please produce "Data from ecfmg.org" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- K. Please produce copies of the "Personal References and Awards" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- L. Please produce "All public accessible Internet data" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- M. Please produce "Defendant's data from google.com" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- N. Please produce "All public news data" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- O. Please produce "Defendant's data from aua-med.com" as identified in your Rule 26 disclosures.
- P. Please produce "All Plaintiff's, agents and partners (sic) data/records/document/books" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- Q. Please produce "standard medical references and books" as identified in your Rule 26 disclosures which you intend to rely upon at trial.

- R. Please produce "All documentation and data pertaining to St. Joseph Mercy Oakland Hospital and Trinity Health" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- S. Please produce "All communications between Defendant and Plaintiff (including agents and partners)" as identified in your Rule 26 disclosures which you intend to rely upon at trial.
- T. Please produce any and all emails, correspondence and comments referenced on your website as "comments and support."
- U. Please produce any and all documents/exhibits/tangible things referenced in any addendums or amendments to your Fed. R. Civ. P. 26 disclosures.
- V. Please produce any and all exhibits or demonstrative aids which you intend to rely upon at trial.
- W. Please produce for inspection the Fiber Optic Training Device identified in your Rule 26 disclosures. You may produce this to Plaintiff's Counsel's office on November 30, 2010 at 9am or another date, time and place as may be agreed upon.
- X. Please produce any and all documentation or evidence that you intend to rely upon at trial to establish the following claims as true:
  - 1. AUA routinely commits fraud upon its students;
  - 2. AUA falsifies its students grades;
  - 3. AUA breaches contracts;
  - 4. AUA disregards student civil rights;
  - 5. AUA conspires against its students;

6. AUA pursues unspecified and other unethical practices;
7. AUA has “malicious intensions” and administration and academic advisors of a “heinous nature”;
8. AUA students are sexually assaulted;
9. AUA professors teach students wrong information;
10. AUA conspires to commit fraud and violations of civil rights;
11. AUA commits criminal activities reportable to the FBI;
12. AUA student pass rate for USMLE medical board exams is only 22.9%;
13. AUA contrives false evidence in student disciplinary proceedings;
14. AUA colluded with St. Joseph Hospital to maliciously end Mr. Woodward’s career, conspired, abused its power, committed perjury and is otherwise immoral and unethical;
15. AUA agents are liars;
16. The locality of AUA is full of “rape, murder, fraud, and government corruption.”

/s/ Eric A. Buikema (P58379)  
Eric A. Buikema (P58379)  
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Dated: November 8, 2010